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Secretary
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FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

30 AUG 1994

IN REPLY REFER TO:

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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The Honorable Dianne Feinstein
United States Senate
331 Hart Senate Office Building
Washington, DC 20510-0504

Dear Senator Feinstein:

This is in reply to your letter of August 17, 1994, on behalf of your constituent, Charles E. Nelson, an Oakland police lieutenant, who is interested in the implementation of Enhanced 911 (E-911) technology in the Personal Communication Services industry.

On September 23, 1993, the Commission adopted a Second Report and Order in GEN Docket No. 90-314 that established rules for new Personal Communications Services (PCS). In this Order, we urged the PCS industry and standards-setting bodies to "direct particular attention [to] offering an emergency 911 capability that would work with enhanced-911 systems (E-911) and, to the extent feasible, permit locating a caller in situations where the caller is unable to state his location." Also, we indicated that we were contemplating the initiation of a future rule making proceeding "to address E-911 and related issues with regard to PCS, cellular, and any other relevant mobile service."

In response to our Order, the Texas Attorney General's Office filed a Petition for Reconsideration requesting that we require PCS licensees to provide E-911 service as a condition of license, and that we require development of a single, uniform standard for PCS E-911 service. There were a number of comments filed in support of Texas' petition. Several companies expressed concern about the potentially significant added costs of providing precise E-911 location information, as well as the delays that an FCC mandate for providing such information could bring to PCS development.

The Commission carefully considered the Texas petition and the comments filed in response to it before adopting its Memorandum Opinion and Order in GEN Docket No. 90-314 on June 9, 1994. That order, among other things, promised the prompt initiation of a separate rule making proceeding dedicated exclusively to the E-911 capabilities of mobile telephone services. This proceeding will allow us to fully address all regulatory aspects of E-911, and to develop the most fair and effective regulations possible. In the meantime, a joint industry group consisting of representatives from the Association of Public-Safety Communications Officials (APCO), the National Emergency Number Association (NENA), and the Personal Communications Industry Association (PCIA), have been working to develop a common position on how PCS E-911 service should be implemented.

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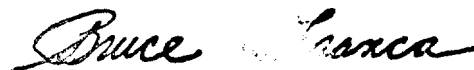
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The Honorable Dianne Feinstein

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We appreciate your constituent's thoughts on this important topic and have added them, along with your letter, to the record in the PCS proceeding.

Sincerely,



Bruce A. Franca
Acting Chief Engineer

Richard B. Engelman
Chief, OET/AED/TSB

Julius P. Knapp
Chief, OET/AED

cc (w/incoming): Secretary, for inclusion in GEN Docket 90-314

cc: Chief Engineer
Julius Knapp
Richard Engelman
Robert Bromery
Art Wall

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DIANNE FEINSTEIN
CALIFORNIA

COMMITTEE ON APPROPRIATIONS
COMMITTEE ON THE JUDICIARY
COMMITTEE ON RULES AND ADMINISTRATION

United States Senate

WASHINGTON, DC 20510-0504

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August 17, 1994

Ms. Lauren J. Belzin
Acting Director, Office of Legislative Affairs
Federal Communications Commission
1919 M Street, N.W.
Room 808
Washington, D.C. 20554

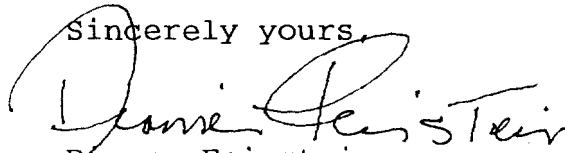
Dear Ms. Belzin:

Enclosed is a letter from my constituent Charles E. Nelson regarding P.C.S. wireless service. In order to fully respond to my constituents, it is important to have your position and views of the question(s) raised.

Since my office receives a large volume of mail, please refer your return correspondence to Karen Flores in my Washington office. If you have any further questions, Karen can be reached at (202) 224-9341.

Thank you for your attention to this matter.

Sincerely yours,


Dianne Feinstein
United States Senator

DF:krf

Friedman 100
CITY OF OAKLAND



POLICE ADMINISTRATION BUILDING • 455 - 7th STREET • OAKLAND, CALIFORNIA 94607-3985

Police Department

Telephone Device for the Deaf 273-3227

April 4, 1994

Senator Dianne Feinstein
331 Hart Building
Washington, D.C. 20510

Dear Senator Feinstein:

I am writing to ask your support to provide a wireless service, Personal Communications Service (PCS), that will ensure the safety of the user of that service. I am one of your constituents and I work in the field of public safety as Commander of the Oakland Police Department Communications Division. PCS is about to become a reality and we in public safety have a great concern for its ability to provide at least the same level of protection that its users have come to expect from 911 telephone systems.

Currently when a person dials 911 in response to an emergency in their home, the 911 operator answering the call receives vital information to help speed processing and assistance. That information includes such things as the telephone number, address information, and emergency service providers (police, fire and medical) for that location. The availability of this information with 911 calls saves lives on a daily basis. However, unless Congress and/or the FCC acts quickly the PCS equipment about to be released on the market will not provide this life saving information. In the next few years PCS equipment will flood the market. A large percentage of our 911 calls in the future will come from PCS equipment. Unless we take action now, PCS equipment will not provide the life saving information we routinely receive from conventional telephone equipment and the value of 911 as an emergency number will be eroded accordingly.

At this point, the FCC has declined to mandate that manufacturers and providers of PCS services provide location and caller identification. The FCC has only noted that PCS manufacturers should be "cognizant" of the noted 911 features and to the "extent feasible" provide for these features. From the perspective of a

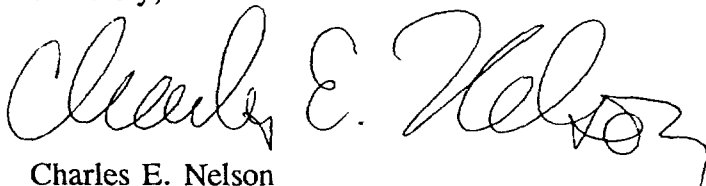
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potential user of PCS equipment as well as that of a public safety officer, anything less than a mandate is unsatisfactory. The technology is there but the incentive will not be there unless the life saving features are mandated industry-wide. The extra cost per unit to provide this life saving information should not be significant. However, the incentive to provide the capability must compete with the cost of providing it. Without a mandate, the feature will fall by the wayside and the cost will ultimately be measured in lives and public safety.

This is a national issue and the time to act is short. It is far better to address this issue at the beginning, before the equipment hits the streets, rather than to try to address the matter after the fact. Once the equipment is being marketed the damage is being done to the system. Lets stop it before it starts.

I am asking you as my representative, to have the FCC take the necessary steps to mandate exact physical location of a caller that uses wireless service, and to provide the same life saving capabilities as enhanced 911 service now provides to our residential and business communities. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script, reading "Charles E. Nelson". The signature is fluid and includes a stylized flourish at the end.

Charles E. Nelson
Lieutenant of Police
Communications Division



MICHAEL R. OLIVER
CHIEF OF POLICE

BELMONT POLICE DEPARTMENT

Senator Dianne Feinstein
Hart Senate Office Building, Rm. 331
Washington, DC 20510

Dear Senator Feinstein,

I am writing to you to ask your support to provide a wireless service, Personal Communication Service (P.C.S.), that will ensure the safety of the user of that service. I am one of your constituents and I work in the field of public safety as a peace officer. Personal Communication Service is about to become a reality and we in Public Safety have a great concern for its ability to protect its user.

Let me set the scene for you:

ENHANCED 9-1-1 SERVICE

You are at home, an emergency arises, you simply dial 9-1-1. Your call is answered by a call taker at your emergency center. Along with that call comes vital information; i.e. name, address, city, zip, telephone number, date, time of day and the public safety agencies (fire, police & EMS) that cover your address. Response is quick. Dispatch is almost immediate and your loved one is treated.

P.C.S. WIRELESS SERVICE

You take your small telephone unit with you and go for a walk in the park. While a mile or so away, you become violently ill. You take out your small telephone and dial 9-1-1. The call taker in your emergency center answers but has no idea of where you are. If you are unable to speak -- well, you can see the obvious consequences.

I hasten to add that cellular service, as we know it today, in almost all cases provides neither the calling number nor the location of the caller.

This is a national issue. Within one to three years this service will begin to seriously affect wired telephone service. People will remove their residence lines to reduce cost and use wireless and pay air time.

I want you, as my representative, to have the F.C.C. take the necessary steps to mandate exact physical location of a caller that uses wireless service, and to provide